

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DELCINE THOMPSON	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 08 C 1222
	)	
ILLINOIS DEPARTMENT OF	)	Honorable Joan H. Lefkow
CORRECTIONS and	)	
EDWARD HUNTLEY, individually and	)	Magistrate Judge Maria Valdez
In his capacity as Chief Legal Counsel of	)	
The Illinois Department of Corrections,	)	
	)	
Defendants.	)	

**NOTICE OF MOTION**

To: Mr. Hubert O. Thompson  
Mr. Ronald Austin, Jr.  
BROTHERS & THOMPSON, P.C.  
100 West Monroe, Suite 1700  
Chicago, Illinois 60603

**PLEASE TAKE NOTICE** that on the 16<sup>th</sup> day of September, 2008, at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Joan H. Lefkow, or whomever may be sitting in her stead, at the United States District Court for the Northern District of Illinois, Eastern Division, at 219 South Dearborn Street, Chicago, Illinois, Room 1925, and then and there present the attached **MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**, a copy of which is attached and hereby served upon you.

LISA MADIGAN  
Illinois Attorney General

**ILLINOIS DEPARTMENT OF  
CORRECTIONS and EDWARD HUNTLEY,  
individually and in his capacity as Chief Legal  
Counsel, Defendants**

By: s/ Mary M. Madden

MARY M. MADDEN  
Assistant Attorney General  
100 West Randolph Street, 13<sup>th</sup> Floor  
Chicago, Illinois 60601  
(312) 814-7201

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **NOTICE OF MOTION** and **MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER** was served this 9<sup>th</sup> day of September, 2008, by electronic mail upon the following:

Mr. Hubert O. Thompson  
Mr. Ronald Austin, Jr.  
BROTHERS & THOMPSON, P.C.  
100 West Monroe, Suite 1700  
Chicago, Illinois 60603  
[hthompson@brothersthompson.com](mailto:hthompson@brothersthompson.com)

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s/ Mary M. Madden

MARY M. MADDEN